



Coastal Protection and
Restoration Authority of Louisiana

June 05, 2008

The Honorable J.P. Woodley
Assistant Secretary, Civil Works
U.S. Army
108 Army – Pentagon
Room 3E446
Washington, DC 20310-0108

Dear Secretary Woodley:

I am pleased to present the recommendations of the State of Louisiana for revisions to the Principles and Standards that apply to Corps of Engineers water resources planning.

A new strategy is essential. We must have a new strategy for water resources planning. Water resources planning must support sustainable development recognizing the multiple objectives of public safety, national and regional economic development, environmental quality, and social well-being. We can no longer afford to focus on the narrow objective of National Economic Development. The experience of Louisiana is clear. For decades water management in Louisiana was driven by pursuit of national economic development in defense of the Federal budget to the exclusion of public safety, the coastal ecology and the well-being of people. We must move water resources development forward to embrace the full range of national objectives.

We continue to expand our understanding of the lessons of Hurricanes Rita and Katrina. The IPET report reached the painful conclusion that the storm defenses of Louisiana were a “system in name only.” The results were devastating. The long history of water resources development in Louisiana discloses a record of successes in defending Louisianans from the Mississippi River’s floods and taming the River for navigation. Both contributed great benefits to the entire nation. Regrettably, this same history discloses shortcomings in the failure to integrate adequate storm protection and mitigate impacts to our coast, its valuable ecology and its contributions to natural storm attenuation. Corps water resources planning and development must be founded on a watershed and systems approach that comprehensively integrates effects that have been ignored for far too long. The water resources project focus of the past must give way to a comprehensive, watershed framework if we are to reverse our fortunes and create a sustainable Louisiana with a sustainable coastal landscape.

Watershed and systems cannot be achieved if the Corps limits plans to the tools and management measures that the Corps can implement within its budgetary priorities and authorities. Corps water resources planning must fashion optimal watershed solutions that select elements from a full range of best management practices including those of other Federal agencies, non-Federal governments and non-governmental organizations. The Coastal Wetlands Planning Protection and Restoration Act Program (CWPPRA) set a direction for bringing this optimal combination of management practices to bear in Louisiana. CWPPRA provided for collaboration in planning and implementation. The Water Resources Development Act of 2007 established a collaborative framework for Louisiana coastal protection and restoration. Our vision for Corps water resources planning must be founded on this same model of collaboration. The Corps must develop its plans collaboratively and formulate them for collaborative implementation.

Collaboration must not just include, but encourage a stronger role for non-Federal partners in planning and decision-making. The State of Louisiana needs the Corps and its Federal partners but the planning process must recognize that the quality of life in Louisiana is in the balance. The past has been characterized by the Federal government's inflexibility in dictating solutions to the State. Your new planning model must make us true partners. Collaborative planning, decision-making and implementation among Federal and non-Federal partners are crucial to success.

Planning must be streamlined. This challenge is less a problem of the objectives and the ideal model incorporating watersheds and collaboration than it is a manner in which the process is carried out. The Corps must fully invest in modern information technology and in basic data and models to speed up screening of alternatives and analysis. The Corps partners can't afford to wait for decades to forge commitments to broad strategies to solve problems like making the people of Louisiana safe and recovering the loss of coastal land and resources. In addition, the proposed long-awaited and inflexible "solutions" are no longer applicable to our dynamic coastal landscape.

The Corps needs to find a way to collaborate with the State to develop data, science and models and then exercise the discipline to screen out the weak plans and move more quickly to real solutions with participation of the State in those decisions. The needed strategy for water resources planning – the collaborative, watershed model – is sound but the Corps must invest in the tools to make it work for timely solutions to our problems. One way to help improve the timeliness of Corps planning is to adjust the attitude toward a willingness to incorporate the technical and planning contributions of non-Federal partners like the State of Louisiana. Too often the Corps starts from scratch and is unwilling to build in the contributions of the State of Louisiana and others. This approach is not only

wasteful of resources and time but often results in competing Federal and non-Federal problem solving strategies and analyses where there should be collaborative solutions. The nation can't afford a water resources planning duel between the Federal government and the States. Another issue is the layers of review of planning documentation and decisions. If some of these layers cannot be eliminated, we must find ways to conduct them concurrently rather than sequential as is the current practice.

Another promising approach is to move toward more programmatic authorities founded on the watershed and systems approach. History tells us that the Great Mississippi River Flood of 1927 subsided in August of that year. By January General Jadwin had submitted the Corps plan to "never let it happen again." By May Congress and the President jointly approved this plan in the Flood Control Act of 1928. The Mississippi River and Tributaries Project was truly a regional programmatic authority. The Corps should re-examine the current authorization process to consider alternatives for such regional programmatic strategies subject of course to Congressional oversight.

The needed strategy for Corps planning discloses the necessary changes in the 1983 Principles.

Multiple planning objectives. The 1983 Principles and Guidelines directed the Corps to formulate and recommend water resources plans in response to a single Federal objective – maximizing net national economic development (NED) benefits. Specifying a Federal objective suggests that the Federal government is pursuing its own well-being rather than the welfare of the people. The budget process often confirms that the Federal interest has often been narrowly defined in terms of saving money instead of helping people who face daunting water resources challenges. Hurricanes Katrina and Rita were clear evidence of the failure of even those objectives (economic development and saving money). To date, Congress has provided nearly \$150 billion in funding and programs responding to the hurricanes. Much more is needed. A fractional proactive investment could have prevented the majority of losses, deaths and response and recovery efforts. We must turn instead to the national interest and recognize that the Federal government, States, local governments and even non-government entities can work together to best solve water resources problems. The Corps water resources planning objectives must promote collaboration and include:

- Public safety. Public safety must be paramount. The tragedies of hurricanes Katrina and Rita must never be repeated in Louisiana or anywhere else in America. Corps planning must have a reasonable standard for protecting Americans and their families.

- Environmental quality. Our national values include our environment as well as economy. Our quality of life depends on both. Our national water resources planning objectives must include restoration of aquatic ecologies.
- Regional economic development. Our nation has a tradition of positioning every region for success. Water resources policy cannot leave one region behind the rest. Today Louisiana continues to suffer economically and socially from the devastation of 2005. Water resources development should recognize such need. The Corps should plan water resources in response to a regional economic development objective – including the needs of our fishing and agricultural families and other low income communities.
- Social well-being. Just as the nation is stronger when its various regions and communities have a level playing field so it is also strengthened when policy recognizes those who are less fortunate. The tragedy of hurricanes Katrina and Rita fell hard upon the poor. The NED objective disfavors protecting the lives and property of low income families. Corps water resources planning must be adjusted for this disparity by recognizing a social well-being objective.

In the Water Resources Planning Act of 1965 Congress clearly intended that environmental quality, regional economic development and social effects be included as national planning objectives. The Water Resources Development Act of 1986 directed the Corps to include the protection of life as a planning objective. The revised Principles and Standards must be made consistent with national priorities and policies.

Watershed and Systems Approach. The IPET report gave a clear message: Ignoring a systems perspective involves great peril. By the same token the pages of our nation's history include the work of many water resources commissions starting with Theodore Roosevelt's Waterways Commission in 1908. Nearly every single one of these commissions urged that our water resources be developed and managed in a basin or watershed context. Yet the 1983 Principles and Guidelines established a framework that put the emphasis on single projects. Too often planners have developed these projects with little awareness of the larger watershed implications. Corps planners often bypassed comprehensive solutions to focus on site specific projects. The outcomes of this approach can be debilitating. The great successes in some water purposes have sometimes come at great expense to our natural resources. The coast of Louisiana is steadily eroding and valuable ecologies and natural storm surge attenuation are disappearing along with the marshes. Louisiana's natural heritage is vanishing. Nothing short of a comprehensive watershed approach can reverse these losses and sustain our other important water resources objectives. Responding to the IPET recommendations and those of many other independent experts, the State of Louisiana developed an integrated, systems-based master plan for our coastal area. In addition, we are

well on our way to uniting all of our coastal restoration and hurricane protection agencies into a new, integrated organization. The revised Principles and Standards must be erected on a similar watershed and systems approach.

Collaborative Plans and Implementation. This nation is endowed with a diverse capability to solve water resources problems. This capacity is manifest in Federal, state, tribal and local water agencies and water organizations outside the government sector. The nation simply cannot afford to plan water resources development and protection in a way that excludes the full participation of all these organizations. Each of them can bring their own specialties, expertise and authority to build a team that contributes more than the sum of each of them acting alone. Water resources practice has ignored this reality far too long. There have been some notable exceptions in Louisiana. The Coastal Wetlands Planning Protection and Restoration Act serves as a model of collaborative team building that brought together Federal agencies, the state and all the stakeholders to take enormous and successful first steps in reversing damage to Louisiana's coast. The Federal agencies continue to work side by side with the State, local governments and non-governmental entities to plan the crucial next phase for protecting and restoring coastal Louisiana. This collaborative model is sound and will ultimately make the difference in meeting national objectives. The Corps can't succeed alone by planning isolated projects without the complementary efforts of others. The revised Principles and Standards must emphasize collaborative planning and implementation. The watershed and systems approaches cannot succeed without collaboration.

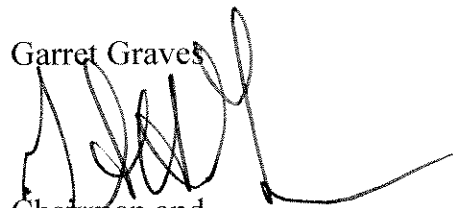
Removing arbitrary constraints. Corps planning must be conducted without arbitrary and artificial constraints. During enactment of the Water Resources Development Act of 2007, statements of executive branch policy promoted imposing budgetary criteria on the formulation of Corps water resources plans. Advocates make claims that constraining plans to have arbitrarily high benefit cost ratios promote "high returns." Such project decision rules have no foundation in policy or economics. Such criteria merely lay waste all efforts to develop comprehensive watershed and systems solutions. Again, the vital "lesson learned" from Hurricanes Katrina and Rita that prioritization criteria should transcend traditional cost-to-benefit ratios must be applied. The \$150 billion (and counting) Federal cost responding to the 2005 hurricanes does not support the ratios' previous conclusions. The revised Principles and Standards must remove such constraints and avoid adding new ones.

Shared decision-making. The new Principles and Standards should permit and encourage a greater sharing of decision-making with non-Federal interests and stakeholders. The current emphasis on sole Federal ownership of decisions is an anachronism that inhibits timely solutions and can lead to unworkable plans.

Streamlining the Process. The Corps must pursue this contemporary planning process with a supporting strategy for streamlining and sharing decisions with non-Federal partners. Some of the targets were discussed above and there are doubtless other ideas that will make planning more timely. A strategy for streamlining must buttress the contemporary process. The State of Louisiana wants to help the Corps find ways to streamline water resources planning. The State hopes the Corps will reach out to make streamlining a reality across the nation. The Corps must undertake a strategic assessment of streamlining in collaboration with non-Federal partners.

In summary, Secretary Woodley, the State of Louisiana urges that you revise the Principles and Standards to include the national objectives of public safety, national and regional economic development, environmental quality and social well being. Further, I urge that pursuing these objectives be founded on comprehensive watershed and systems approaches that emphasize collaborative planning and implementation as crucial to success. Thank you for the opportunity to submit these recommendations on behalf of the State.

Garret Graves

A handwritten signature in black ink, appearing to read 'Garret Graves', with a long horizontal flourish extending to the right.

Chairman and
Executive Assistant to the Governor